

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	
RAUL RODRIGUEZ RIVERA	*	CASE NO. 13-10865 ESL
ELIZABETH DIAZ ALICEA		
	•	CHAPTER 13
Debtors		

BANCO POPULAR of PUERTO RICO	*	11 USC 362 (d)(1)
	*	Relief from stay for cause
Movant		
	*	
RAUL RODRIGUEZ RIVERA		
ELIZABETH DIAZ ALICEA	*	
and CHAPTER 13 TRUSTEE,		
ALEJANDRO OLIVERAS RIVERA	*	
	*	
Respondent (s)	*	

**DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY
DOCKET NO. 85**

TO THE HONORABLE COURT:

NOW COME, RAUL RODRIGUEZ RIVERA and ELIZABETH DIAZ ALICEA, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. On April 22, 2016, Banco Popular of Puerto Rico ("BPPR") filed a motion for relief from stay in the present bankruptcy case, docket no. 85, basically alleging that the debtors are in arrears in their post-petition direct mortgage loan payments to said creditor for three (3) monthly payments of \$383.00, plus late charges and attorney's fees and costs, for a total owed of \$2,029.64.

2. The debtors respectfully submit that they are in the process of obtaining the funds to cure the aforementioned post-petition arrears.

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Debtors' Response to §362 Motion
Case no. 13-10865 ESL13

3. The debtors respectfully request that this Honorable Court grant them an extension of time to pay BPPR the stated post-petition arrears. The debtors pray this Honorable Court to grant the debtors additional time to cure the post-petition arrears owed to BPPR within the next thirty (30) days, from the date of the preliminary hearing, scheduled for May 17, 2016. This extension of time to expire on June 16, 2016.

WHEREFORE, debtors respectfully request from this Honorable Court to grant the requested extension of time to cure the post-petition arrears owed to BPPR, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; Kevin Miguel Rivera Medina, Esq., *Colon Santana & Asociados CSP*, Counsel for BPPR; I also certify that a copy of this motion was sent via regular mail to the debtors/respondents Raul Rodriguez Rivera and Elizabeth Diaz Alicea, HC 01 Box 5569 Gurabo PR 00778.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 3rd day of May, 2016.

/s/Roberto Figueroa Carrasquillo
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